

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES  
(NPMHU/USPS-7 and 8)**

The United States Postal Service files its responses to the above-listed interrogatories of the National Postal Mail Handlers Union dated April 6, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-7** Please provide as a Library Reference the implementation plans created by each gaining or losing facility that Witness Williams testified would be completed on or about March 30, 2012.

**RESPONSE**

Witness Williams did not testify that any such plans would be completed on or about the end of March 2012. He testified that it was his expectation that implementation plan *proposals* would be submitted by the field to headquarters by March 30 for review and that such review would ultimately lead to the development of *final* plans. See Tr. Vol. 2 at 345.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-8** Please provide as a Library Reference any facility schematics, floor plans, or other documents used during the AMP study or approval process that plan for how additional equipment, staff and mail volume will be accommodated at the following gaining facilities: Albuquerque; Austin; Baton Rouge; Boston; Brooklyn; Cleveland; Columbus; Greensboro; Kansas City; Miami; Nashville; Oklahoma City; Orlando; Philadelphia; Pittsburgh; Richmond; Rochester; Tallahassee; and Westchester.

**RESPONSE**

See USPS Library Reference N2012-1/95.